

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: KEON FRANK**

**: CHAPTER 13**

**Debtor(s)**

**: BANKRUPTCY NO. 23-11974**

**CERTIFICATE OF SERVICE AND  
CERTIFICATION OF NO RESPONSE**

I, PAUL H. YOUNG, ESQUIRE, attorney for Debtor, do hereby certify the following:

1. I served by facsimile and/or first-class mail on August 7, 2024, a true and correct copy of Debtors' Motion to Modify the Chapter 13 Plan and Notice of Motion, Response Deadline and Hearing Date on the U.S. Trustee, Trustee and all creditors on matrix.

2. I have not received a responsive pleading from any party or answers within the time period provided by the Rules of Court.

WHEREFORE, it is respectfully requested that this Honorable Court enter the proposed Order attached to the Motion to Modify Plan.

/s/ Paul H. Young  
PAUL H. YOUNG, ESQUIRE  
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